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T.R.A. DOCKET ROOM  
September 30, 2005

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VIA HAND DELIVERY

Hon. Ron Jones, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Bristol Tennessee Essential Services Application for a Certificate of Convenience and Necessity to Provide Competing Telecommunications Services*

Docket No. 05-00251

Dear Chairman Jones:

Enclosed are the original and fourteen copies of BellSouth's *Petition to Intervene*. Copies of the enclosed are being provided to counsel for BTES.

Very truly yours,

Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

IN RE:       *Bristol Tennessee Essential Services Application for a Certificate of Convenience and Necessity to Provide Competing Telecommunications Services*

Docket No. 05-00251

**PETITION OF BELL SOUTH TELECOMMUNICATIONS, INC.**  
**FOR LEAVE TO INTERVENE**

BellSouth Telecommunications, Inc., pursuant to T.C.A. §4-5-310 and T.C.A. §65-2-107, petitions the Tennessee Regulatory Authority (the "Authority") for leave to intervene in the above-captioned proceeding, and in support thereof states as follows:

1. BellSouth, a Georgia Corporation authorized to conduct and conducting a public utility business in the state of Tennessee, is engaged in furnishing telecommunications service in the state of Tennessee.

2. Bristol Tennessee Essential Services ("BTES") seeks Authority approval to operate as a CLEC "throughout the State of Tennessee." (See *Application* at p. 16)

3. BTES seeks approval to provide telecommunications services in competition with BellSouth. BellSouth has a direct and substantial interest in the manner in which municipal applicants such as BTES propose to comply with the competitive safeguards and other requirements set forth principally at T.C.A. § 7-52-401, *et seq.* Moreover, at a minimum, BTES should be prohibited from

providing telecommunications services outside of the geographic limits of the City of Bristol, as required by statute, unless and until BTES demonstrates that it has obtained the consent of municipalities outside its own in which it seeks certification.

4. BellSouth's legal interests may be determined in the proceedings and BellSouth's interests will not be adequately represented unless the Authority allows the BellSouth to intervene.

5. No procedural schedule has been set. Allowing BellSouth to intervene will not impair the interests of justice or the orderly and prompt conduct of these proceedings.


6. BellSouth respectfully requests that it be granted leave to intervene and participate as a party in the above-captioned proceeding.

WHEREFORE, BellSouth prays:

1. That it be permitted to intervene in this proceeding and participate as a party.
2. That BellSouth have such other and further relief to which it may be entitled.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



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CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2005, a copy of the foregoing document was served on the following, via the method indicated:

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

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